CES Environmental Services, Inc. (As of April 16, 2015)

The EPA mobilized to the Site on September 3, 2014 and began addressing the wastes and spills located on the CES Environmental Services, Inc. site.

As of April 16, the EPA Team has addressed the following:

Vacuum Boxes (original): Wastes contained in the original 11 vacuum boxes have been transferred into shippable vacuum boxes and off-site for disposal (Trustee addressed 1 of these vacuum boxes). All original vacuum box containers have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Roll-Off Boxes (original): Wastes contained in the original 2 roll-off boxes have been disposed (Trustee addressed 1 roll-off box). All original roll-off boxes have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Frac Tanks (original): Waste removed from 9 of 12 frac tanks (3 of 12 were originally empty). Seven (7) of the emptied frac tanks that were originally rented by CES Environmental Services during their operations were released back to those rental companies (1 to Dynamic Rental Systems, 6 to Dana Transport). The EPA has notified Dana Transport that 1 additional frac tank is ready for pickup but axle and wheels will need to be replaced. At this time, the 4 CES frac tanks on-site will be used as necessary cleanup operation waste storage.

Aboveground Storage Tanks (ASTs): Liquids and sludge have been removed from all 20 Steel ASTs. The remaining tankage in this area include two (2) Poly Tanks (PT2, PT3) which remain to be addressed. The disposition of the wastes in these two (2) Poly Tanks is currently being determined. The secondary containments need to be cleaned and the piping needs to be confirmed empty.

Waste Water Treatment Tanks (WWTT): Liquids and sludge have been removed from 19 of 20 Waste Water Tanks. The remaining tank contains lime. The lime tank will be removed either into vacuum box or roll-off box. The secondary containment of the Waste Water Treatment area will require cleaning to remove sludge. Additionally, the piping needs to be confirmed empty.

Totes/Drums/Vats/Misc Containers: Empty containers have been segregated for cleaning (pressure washing). Full/Partially Full containers have been sampled, field characterized and currently being segregated into appropriate waste streams to be bulked, sampled, and properly containerized for disposal. There are approximately 3 poly tanks, 1 Vat to be addressed with contents and 124 totes/drums (23 with contents) that remain to be cleaned, crushed/cut-up and disposed.

Removal of Contaminated Sediments/Solids: General cleaning of visibly contaminated areas causing sheens on storm water has been completed. The cleaning of stained areas will continue to the extent possible but is not a high priority unless it is or possibly could cause a sheen on the storm water. Silt barriers and oil absorbent boom are in place to reduce sediment and hydrocarbon releases to storm water drains during a rain event.

Loading Bays (Main Warehouse): The bays have been substantially cleared of debris and chemical wastes to the extent possible although the trenches will have to be addressed. Final cleaning of the bays will be necessary.

Truck Cleaning Bay: The bays have been cleaned and sludge substantially removed from trenches leading to sump. The sump and trenches remain to be addressed. This area will be used for container cleaning activities, as necessary.

Storm Water Management: This activity continues as rainfall occurs. Storm water is being allowed to drain from the site

through silt barriers and absorbent boom. The southern portion of the facility currently remains diked which disrupts cleanup operations after a rain event. The site is usually inundated with storm water during a rain event. A one inch rainfall adds approximately 180,000 gallons of water on the facility where approximately 60000 gallons drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility where it is currently diked. Eventually, the diked area will be opened up to allow normal storm water runoff to occur albeit through silt barriers and absorbent boom. The City of Houston has assisted EPA in allowing it to discharge the original accumulated and contaminated storm water into the City of Houston sanitary sewer and this option currently remains an option for questionable storm water issues should the need arise.

Waste Piles (Southern Portion of Facility): Trustee removed wastes dumped to the ground in March 2014 due to the theft of 7 roll-off boxes. An additional debris pile exists that is associated with the construction of the berm around the southern portion of the facility.

Lab Chemicals/Company Profile Samples: Trustee consolidated and disposed;

Bulk Process Chemicals: Trustee collected and disposed;

Items that Remain to be completed:

1. Wastewater Treatment Tank Area
   - Sludge Removal: LIME
   - Residual Sludge Removal: PT5
   - Piping: Remove Materials
   - Secondary Containment: Final Cleanup

2. Aboveground Storage Tank Area
   - Liquid Removal: PT2, PT3
   - Piping: Remove Materials
   - Secondary Containment: Remove contaminated Sand and Final Cleanup

3. Frac Tank Waste Disposal
   - Frac Tanks: FT1001, FT5180
   - Frac Tank (Off-Site Cleaning/Deodorizing): FT1004
   - Contact Dana Transport: Pick Up and Clean One (1) Frac Tank

4. Bulk Poly Tanks, Totes, Vats, Drums, Misc Containers, Carbon, Supersacks: Approximately 124 totes/drums needed to be addressed which includes 23 with contents to be transferred into vac box or roll-off box. The plan is to cut up/crush/dispose of empty totes/drums. The approximate break down is 33 totes, 68 drums (metal), 23 drums (poly).

5. Remove Material (Liquids/Solids) form Large VAT South of ASTs

6. Place large pipe with valve out the South Pond Area for Storm Water Drainage;

7. Main Warehouse
   - Chop Saw Piping in Trench and Remove Trench Solids
   - Clean Contaminated Solids from Warehouse Floor
   - Remove solids from Tanker Trailer Vessel

8. Truck Wash Bay, Shed, Former Shed:
   Truck Wash Bay: Remove Liquids/Solids and from Sump and Trenches and Final Clean
   Shed: Remove Liquids/Solids from Sump and Drains and Final Clean
   Former Shed: Remove Liquids/Solids from Sumps and Trenches and Final Clean

9. Dispose of Containerized Wastes (vac boxes, fracs tanks, roll-offs, drums/totes)

Roll-off Boxes:

Number	Status
OT 25563	Sand/Trench Residue
OT 25480	Cut up Totes and Drums
OT 25337	Debris (ADS Hose, Wood,Pails, Plastic)
OT25319	Empty
OT25134	Empty

Vacuum Boxes:

Number	Status
VB 25242	Empty (Off Rent/Pickup Scheduled)
VBDW 25147	Sludge from Group 24, 25, 26, and 27 (Active)
VB 25229	FT 1004 Sludge (Active)
VB 25206	FT1004 Oily Material
VB 25274	FT 1004 Oily Material
VB 25315	Empty

Frac Tanks:

Number	Status
FT 1001 (CES)	Full
FT 5180 (CES)	Active 5%
FT 1004 (CES)	Empty (Send off for Cleaning/Deodorizing)
FT 1002 (CES)	Empty - Rinsed
FT 30335 (DANA)	Empty-Rinsed
A4198C (Adler)	Decon Water

Bulked Containers: Materials Repackaged

Description	Number of Containers
Acid Containers	18 Totes, 59 Drums
Base Containers	6 Totes, 1 Drum

EPA Removal Costs (Estimated as of 4/15/15): $ 1,570,941